

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 18-Cr-20495

v.

HON. DAVID M. LAWSON

IBRAHEEM IZZY MUSAIBLI,
aka Abu Shifa Musaibli,
aka Abu 'Abd Al-Rahman Al-Yemeni,
aka Abu Abdallah Al Yemeni,
aka Abdallah Umar Al-Salih,
aka Ibraheem 'Izd 'Umar Salih Musaibad,

Defendant.

**MOTION TO EXCEED PAGE LIMIT FOR GOVERNMENT'S MOTION
AND SUPPORTING MEMORANDUM OF LAW FOR AN ORDER
PURSUANT TO SECTION 4 OF THE CLASSIFIED INFORMATION
PROCEDURES ACT AND RULE 16(d)(1) OF THE FEDERAL RULES OF
CRIMINAL PROCEDURE**

The United States, through its undersigned attorneys, hereby moves this Court, pursuant to Local Rule 7.1(d)(3)(A), for an order permitting the government to file a motion and supporting memorandum of law for an order pursuant to Section 4 of the Classified Information Procedures Act and Rule 16(d)(1) of the Federal Rules of Criminal Procedure in excess of the twenty-five page limit.

The government's motion involves a statute that is not a common subject of litigation. As a result, the explanatory material relating to the statute and its

operation comprise a significant portion of the government's brief. Further, the motion addresses in detail the items that are the subject of the government's request under section 4 of the Classified Information Procedures Act and Rule 16(d)(1). For these reasons, the government has written a motion that is forty-three pages in length.

The government sought the concurrence of defense counsel in this request but had not received a response as of the time of filing.

WHEREFORE, the United States requests that the Court grant its motion and permit it to file a brief its motion in excess of twenty-five pages in length.

Respectfully submitted this 22th day, of July, 2019.

MATTHEW SCHNEIDER
United States Attorney

By:

s/Cathleen M. Corken

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2019, I electronically filed the foregoing document using the ECF system, which will send notification of filing to the counsel of record.

s/Cathleen M. Corken
Assistant U.S. Attorney